

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**KOHCHISE JACKSON,**  
Plaintiff,

v.

**CORIZON HEALTH, Inc.,** et al,  
Defendants.

Case No.: 2:19-cv-13382

Hon.: Terrence G. Berg

Mag.: Patricia T. Morris

**PLAINTIFFS' PRELIMINARY  
WITNESS LIST**

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## **PLAINTIFFS' PRELIMINARY WITNESS LIST**

Pursuant to the Court's case management order, Plaintiff Kohchise Jackson submits this list of witnesses who Plaintiff may call at trial. This list is subject to change, including adding or subtracting witnesses as discovery progresses. This list does not include expert witnesses, which will be disclosed in accordance with the Court's scheduling order. Plaintiff also reserves the right to call any witness identified on Defendants' witness lists and to call witnesses for impeachment or rebuttal purposes.

### **1. Kohchise Jackson – Plaintiff**

C/O Plaintiff's Attorneys  
214 S. Main St. Ste 200  
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### **2. Dr. Keith Papendick, D.O.**

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### **3. Dr. Erina Kansakar, M.D.**

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**4. Colleen Spencer, RN**

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**6. Keith Swift**

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**8. Dr. Jan Watson, M.D.**

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Phoenix, AZ 85041  
(602) 957-2407

**9. Brandon Chapman**

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Ionia, MI 48846  
(616) 527-2500

**10. Dr. William Borgerding, D.O.**

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Cheboygan, MI  
231-627-4361

**11. Dr. Steven Bergman, D.O.**

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(248) 644-6326

**12. Larry Cowan**

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Muskegon, MI 49442  
(231) 773-3201

**13. Dr. Carmen McIntyre, M.D.**

Tolan Park Medical Building  
3901 Chrysler Service Dr.  
Detroit MI 48201

**14. Any and all employees, agents, representatives, or custodians of records of Prime Healthcare Services - Port Huron LLC.**

- 15.**Any and all employees, agents, representatives, or custodians of records of Corizon Health, Inc.
- 16.**Any and all employees, agents, representatives, or custodians of records of Quality Correctional Care of Michigan, P.C.
- 17.**Any and all employees, agents, representatives, or custodians of records of the Michigan Department of Corrections.
- 18.**Any and all employees, agents, representatives, or custodians of records of the St. Clair County Sheriff's Office.
- 19.**Any and all employees, agents, representatives, or custodians of records of Detroit Medical Center, Detroit, Michigan, including but not limited to all physicians and other treatment providers involved in performing Plaintiff's colostomy reversal surgery.
- 20.**Any and all witnesses listed by any of the Defendants, whether or not they are called to testify at trial.
- 21.**Any and all persons listed in any party's Initial Disclosures.
- 22.**Any witnesses necessary to lay the foundation for the admission of tangible or documentary evidence.
- 23.**All named Defendants.
- 24.**Any individuals identified in the pleadings, briefs, exhibits, interrogatories, depositions, medical records, jail records, prison records or other discovery.

The Plaintiff has not yet identified any expert witnesses. The individual Plaintiff will disclose the identities of any expert witnesses in accordance with Fed. R. Civ. P. 26(a)(2)(D) and the Court's scheduling order.

Respectfully submitted,

/s/ Laurence H. Margolis

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